

# Exhibit 2



ATTORNEY GENERAL OF TEXAS  
GREG ABBOTT

March 11, 2014

G. DAVID WHITLEY  
ASSISTANT DEPUTY ATTORNEY GENERAL  
DIRECT DIAL: (512) 475-3281

Elizabeth S. Westfall  
Trial Attorney  
Voting Section, Civil Rights Division  
U.S. Department of Justice  
950 Pennsylvania Ave., NW  
NWB Room 7125  
Washington, DC 20530

Re: *Veasey v. Perry*, No. 2:13-cv-193 (S.D. Tex.), ECF No. 180

Dear Ms. Westfall,

The purpose of this letter is to address, as suggested by the Court in its March 4, 2014 hearing, two definitions used in the Defendants' First and Second Requests for Production of Documents to Plaintiff United States of America: "You & your" and "Electronically stored information." The United States' Motion for Protective Order to Limit Extent of Defendants' First Request for Production of Documents, ECF No. 180, ("Motion for Protective Order") only requests the amending of the two definitions as they apply to Defendants' First Request. However, on March 10, 2014, the United States served its Responses and Objections to Defendants' Second Requests for Production of Documents and objected to the definitions of the same two terms at issue in the Motion for Protective Order. Therefore, the Defendants propose to amend the two definitions used in both their First and Second Requests as follows below.

Should you continue to believe these definitions to be overbroad, the Defendants are willing to specify Requests for Production to which the definitions should apply. Please respond by the close of business on March 12, 2014, as to whether you agree to these proposed definitions.

**You and Your**

The terms "you" and "your" mean the Department of Justice, the Department of Defense, the United States Citizenship and Immigration Services, the Department of State, the United States Social Security Administration, the Department of Veteran's Affairs, and the United States Congress.

- 1) The "Department of Justice" means the following Department of Justice agencies, including their attorneys, agents, experts, and support personnel: the Federal Bureau of Investigation, the Office of the Attorney General, the Deputy Attorney General, the Associate Attorney General, the Civil Rights Division, the Criminal Division's Public Integrity Section, and United States Attorneys' Offices.

- 2) The "United States Congress" means the following current or former United States Representatives and Senators, including their attorneys, agents, experts, and support personnel: Al Green (TX-09), Ruben Hinojosa (TX-15), Silvestre Reyes (TX-16), Beto O'Rourke (TX-16), Chet Edwards (TX-17), Sheila Jackson Lee (TX-18), Charles A. Gonzalez (TX-20), Joaquin Castro (TX-20), Nick Lampson (TX-22), Ciro Rodriguez (TX-23), Pete Gallego (TX-23), Lloyd Doggett (TX-25 and TX-35), Solomon P. Ortiz (TX-27), Henry Cuellar (TX-28), Gene Green (TX-29), Eddie Bernice Johnson (TX-30), Marc Veasey (TX-33), Filemon Vela (TX-34), Nancy Pelosi (CA-8 and CA-12), Bob Casey (Pa.), Harry Reid (Nev.), and Kay Hagan (N.C.).

**Electronically Stored Information**

The term "electronically stored information" means electronic information that is stored in a medium from which it can be retrieved and examined. It includes, but is not limited to, all electronic files that can be retrieved from electronic storage.

- 1) "Electronic file" includes, but is not limited to, the following: electronic documents; e-mail messages and files; deleted files; temporary files; and metadata.
- 2) "Electronic information system" refers to a computer system or network that contains electronic files and electronic storage.
- 3) "Electronic storage" refers to electronic files contained on magnetic, optical, or other storage media, such as hard drives, flash drives, DVDs, CDs, tapes, cartridges, floppy diskettes, smart cards, integrated-circuit cards (e.g., SIM cards).

Regards,

/s/ G. David Whitley

G. David Whitley

Assistant Deputy Attorney General